

CULPEPPER IP, LLC
Kerry S. Culpepper, Bar No. 9837
75-170 Hualalai Road, Suite B204
Kailua-Kona, Hawai'i 96740
Telephone: (808) 464-4047
Facsimile: (202) 204-5181
E-Mail: kculpepper@culpepperip.com

Attorney for Plaintiffs

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

Venice PI, LLC, et al.,)	Case No.: 1:19-cv-169-LEK-KJM
)	(Copyright)
Plaintiffs,)	
vs.)	STIPULATION FOR DISMISSAL
)	WITH PREJUDICE PURSUANT
DOE 1, et al.,)	TO FED. R. CIV. P. 41 AND
)	ORDER
Defendants.)	
)	
)	
)	
)	
)	
)	

As attested to by the signatures of CULLEN COUGHLAN (AKA Defendant DOE 3) and counsel for the Plaintiffs below, this matter comes before the Court on the parties' joint stipulation.

Plaintiffs have filed a Complaint [Doc. #1] alleging Direct Copyright Infringement against CULLEN COUGHLAN identified as Defendant DOE 3 among

others.

The parties, after conferral and investigation, now appear, Defendant CULLEN COUGHLAN (AKA Defendant DOE 3) *pro se* and Plaintiffs through counsel to fully and finally resolve all claims between the parties and the matters before the Court and have moved for entry of this Stipulated Consent Judgment.

WHEREFORE IT IS HEREBY STIPULATED AND ORDERED for all matters relevant to this case between the parties as follows:

1. This Court has jurisdiction over the parties and venue is proper.
2. Plaintiffs have valid and enforceable copyrights in the original copyrighted works as identified in Exhibit 1 to the Complaint [Doc. #1-1].
3. Defendant CULLEN COUGHLAN (AKA Defendant DOE 3) concedes to using a software application associated with Defendants DOE 1 and DOE 2 to download at least a part of the motion pictures *Once Upon a Time in Venice* and *Bokya: Undisputed* as alleged in paragraphs 28-29 and 60-61 of the Complaint [Doc. #1] due to deceptive and misleading language which led Defendant CULLEN COUGHLAN (AKA Defendant DOE 3) to believe the software application was a legal platform for downloading movies.
4. Pursuant to stipulation of the parties, the below Permanent Injunction and Order is to be entered against Defendant CULLEN COUGHLAN (AKA Defendant DOE 3).

PERMANENT INJUNCTION

Defendant CULLEN COUGHLAN (AKA Defendant DOE 3) is hereby PERMANENTLY ENJOINED from directly, contributorily or indirectly infringing Plaintiffs' rights in their motion pictures, including without limitation by using the Internet to reproduce or copy any of Plaintiffs' motion pictures, except pursuant to a lawful written license from Plaintiffs.

This Court will retain jurisdiction until April 24, 2021 for the purposes of enforcing the Permanent Injunction and Order.

Except as provided herein, each party is to bear their own costs and fees. With entry of this Consent Judgment, this matter is terminated with respect to Defendant CULLEN COUGHLAN (AKA Defendant DOE 3).

DATED: Kailua-Kona, Hawaii, May 24, 2019.

CULPEPPER IP, LLC

/s/ Kerry S. Culpepper
Kerry S. Culpepper
Attorney for Plaintiffs

DATED: Honolulu, Hawaii, May 23, 2019.

CULLEN COUGHLAN (AKA Defendant DOE 3)

/s/ Cullen Coughlan

Pro Se

Defendant

APPROVED AND SO ORDERED:



/s/ Leslie E. Kobayashi
Leslie E. Kobayashi
United States District Judge

Venice PI, LLC, et al. v. DOE 1, et al.

Case No.: 1:19-cv-00169-LEK-KJM, STIPULATION; AND ORDER